

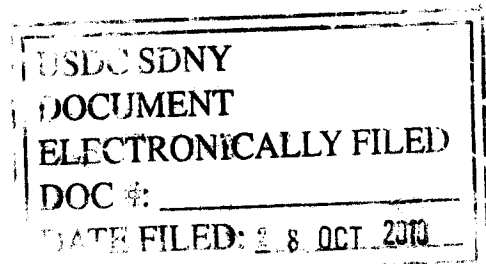
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : SUPERSEDING
 : INDICTMENT
 - v. - :
 : S2 10-Cr. 588

OMAR GONZALEZ, :
 a/k/a "biotechresearch@hush.com," :
 :
 Defendant. :
 :
 - - - - - x

COUNT ONE



The Grand Jury charges:

1. From at least in or about October 2008 through on or about February 23, 2010, in the Southern District of New York and elsewhere, OMAR GONZALEZ, a/k/a "biotechresearch@hush.com," the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that OMAR GONZALEZ, a/k/a "biotechresearch@hush.com," the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substances involved in the offense were (i) mixtures and substances containing a detectable amount of cocaine in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(B); (ii) mixtures and

substances containing a detectable amount of heroin in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(C); (iii) morphine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(C); and (iv) ketamine, its salts, isomers, and salts of isomers, a Schedule III controlled substance, in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(D).

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury also charges:

4. On or about January 12, 2010, in the Southern District of New York and elsewhere, OMAR GONZALEZ, a/k/a "biotechresearch@hush.com," the defendant, unlawfully, intentionally and knowingly, did distribute and possess with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of cocaine.

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C).

COUNT THREE

The Grand Jury also charges:

5. On or about February 23, 2010, in the Southern District of New York and elsewhere, OMAR GONZALEZ, a/k/a "biotechresearch@hush.com," the defendant, unlawfully, intentionally and knowingly, attempted to distribute and possess

with intent to distribute a controlled substance, to wit, morphine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT FOUR

6. On or about February 23, 2010, in the Southern District of New York and elsewhere, OMAR GONZALEZ, a/k/a "biotechresearch@hush.com," the defendant, unlawfully, intentionally and knowingly, attempted to distribute and possess with intent to distribute a controlled substance, to wit, ketamine, its salts, isomers, and salts of isomers, a Schedule III controlled substance, in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(D).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

7. As a result of committing one or more of the controlled substance offenses alleged in Counts One through Four of this Superseding Indictment, OMAR GONZALEZ, a/k/a "biotechresearch@hush.com," the defendant, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the

violation alleged in Counts One through Four of this Superseding Indictment.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

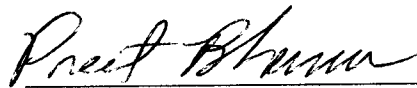
b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846, and 853.)


PREET BHARARA
United States Attorney



Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES OF AMERICA

- v. -

OMAR GONZALEZ,
a/k/a "biotechresearch@hush.com,"

Defendant.

SUPERSDING INDICTMENT

S1 10 Cr. 588

(21 U.S.C. §§ 812, 841(a)(1),
841(b)(1)(B) 841(b)(1)(C), 841(b)(1)(D),
and 846.)

PREET BHARARA

United States Attorney.

10-28-10
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Filed Indictment

Pitman
U.S.M.J.